

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
: CASE NO.: 19-14223-AMC
JAMMIE LYANI :
Debtor : (Chapter 7)
:

PETITION TO WITHDRAW AS COUNSELOR FOR THE DEBTOR

Alan B. Kane, Esquire, hereby moves this Honorable Court for leave to withdraw as Counsel for the Debtor and in support thereof avers as follows:

1. The Petitioner, Alan B. Kane, Esquire, is attorney of record in the above captioned matter for Debtor.

2. Throughout this case, the Petitioner has had difficulty communicating with the Debtor, and there are many times that the Debtor was repeatedly failed to cooperate with counsel or followed counsel's advice.

3. Prior to March of 2020, Counsel for the Debtor would contact the Debtor at her place of employment.

4. The Debtor would complain when counsel contacted at her place of employment because she was "busy with clients".

5. The Debtor does not have a telephone including a cellular telephone and counsel would need to reach the debtor by calling other people who then contacts the debtor to call counsel.

6. The Petitioner believes and therefore avers that the Debtor currently refuses to communicate with the Petitioner regarding this matter as a result of irreconcilable differences.

7. The Debtor has refuses to cooperate with the counsel and the Trustee.

WHEREFORE, the Petitioner respectfully requests that this Honorable Court grant the Petitioner leave to withdraw as the attorney for the Debtor, Jammie Lyani.

Respectfully submitted,

Dated: June 29, 2020

By: 

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Petitioner